

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

**NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE PURSUANT TO FED. R. BANKR. P. 2002**

PLEASE TAKE NOTICE that, pursuant to Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and section 102(1) of title 11 of the United States Code (the “Bankruptcy Code”), Saul Ewing LLP (“Saul”) and Phelps Dunbar LLP (“Phelps”) hereby enter their appearances in the above-captioned cases (“Cases”) as counsel to Peak Living, Inc., Delta Furniture Manufacturing, LLC, and Independent Furniture Supply Co., Inc. (collectively, “American Furniture”), and hereby request, pursuant to Bankruptcy Rules 2002, 3017, and 9007 and section 342 of the Bankruptcy Code, that copies of all notices and pleadings given or required to be given in the Cases and copies of all papers served or required to be served in the Cases, including but not limited to, all notices (including those required by Bankruptcy Rule 2002), reports, pleadings, motions, applications, lists, schedules, statements, chapter 11 plans, disclosure statements, and all other matters arising herein or in any related adversary proceeding,

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

be given and served upon American Furniture through service upon Saul and Phelps at the addresses or e-mail addresses set forth below:

Evan T. Miller, Esq.
SAUL EWING LLP
1201 N. Market St, Suite 2300
P.O. Box 1266
Wilmington, DE 19899
evan.miller@saul.com

Jorge Garcia, Esq.
SAUL EWING LLP
701 Brickell Avenue, Suite 1700
Miami, FL 33131
jorge.garcia@saul.com

Danielle Mashburn-Myrick, Esq.
PHELPS DUNBAR LLP
101 Dauphin Street, Suite 1000
Mobile, AL 36602
danielle.mashburn-myrick@phelps.com

PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, complaint or demand, motion, petition, pleading or request, and answering or reply papers filed in these cases, whether formal or informal, written or oral, and whether served, transmitted, or conveyed by mail, hand delivery, telephone, telegraph, or otherwise filed or made with regard to the Cases and any proceedings therein.

PLEASE TAKE FURTHER NOTICE that, neither this Notice of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive American Furniture's (i) right to have a final order in non-core matters entered only after *de novo* review by a United States District Court Judge; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which American Furniture

is or may be entitled to under agreements, in law, or equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are hereby expressly reserved.

Dated: December 19, 2024
Wilmington, Delaware

SAUL EWING LLP

/s/ Evan T. Miller

Evan T. Miller (DE Bar No. 5364)
1201 N. Market St, Suite 2300
P.O. Box 1266
Wilmington, DE 19899
Telephone: (302) 421-6864
evan.miller@saul.com

-and-

Jorge Garcia (*pro hac vice* forthcoming)

SAUL EWING LLP

701 Brickell Avenue, Suite 1700
Miami, FL 33131
Telephone: (305) 428-4500
jorge.garcia@saul.com

-and-

Danielle Mashburn-Myrick, Esq. (*pro hac vice* forthcoming)

PHELPS DUNBAR LLP

101 Dauphin Street, Suite 1000
Mobile, AL 36602
Telephone: (251) 432-4481
danielle.mashburn-myrick@phelps.com

*Counsel to Peak Living, Inc., Delta Furniture
Manufacturing, LLC, and Independent Furniture
Supply Co., Inc.*